

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
AURORA LOAN SERVICES LLC,

Index No.: 09-CV-9651 (HB)

Plaintiff,

-against-

RULE 26(a) DISCLOSURE

DAVID SADEK; WINTHROP ABSTRACT, LLC,
FIRST FINANCIAL EQUITIES, INC.; THE
CLOSING NETWORK, LTD.; 100 W. 58TH ST. 7C
LLC; MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC.; JPMORGAN CHASE BANK, N.A.;
BOARD OF MANAGERS WINDSOR PARK
CONDOMINIUM; WINDSOR TOV LLC; FREMONT
INVESTMENT & LOAN; JOHN DOES 1-10,

Defendants.

-----X,

Defendant, **THE CLOSING NETWORK, LTD.** by Zisholtz & Zisholtz, LLP, its
attorneys, as and for its FRCP 26(A) Disclosure, alleges as follows:

INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

1. Jay Zucker, Steven Kwestel on behalf of **THE CLOSING NETWORK, LTD.**,
and defendant, **DAVID SADEK**. The defendant, **THE CLOSING NETWORK, LTD.**,
reserves the right to amend this response and supplement additional names.

DOCUMENTS RELEVANT TO THE DISPUTED FACTS

2. Defendant, **THE CLOSING NETWORK, LTD.** expects to rely upon various
documents either at the trial or obtained through discovery of other parties to the action,
including, but not limited to, closing documents, deeds, mortgages, notes, title reports
and correspondence.

COMPUTATION OF DAMAGES

Not applicable

INSURANCE AGREEMENT

Not applicable.

Dated: Mineola, New York
August 12, 2010

ZISHOLTZ & ZISHOLTZ, LLP

By: 

Stuart S. Zisholtz (7533)

Attorney for Defendant, **THE CLOSING
NETWORK, LTD.**

Office and P.O. Address
170 Old Country Road, Suite 300
Mineola, New York 11501
(516) 741-2200

To: **TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP**
Attorneys for Plaintiff, **AURORA LOAN SERVICES LLC**
Four Gateway Center
100 Mulberry Street - Suite 5
Newark, New Jersey 07102
(973) 622-3000
100 Church Street, Room 3-241
New York, New York 10007
(212) 788-1185